

EAG:LAL  
F# 2013R00230

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

EVIDAL IFRAIMOV,

Defendant.

S U P E R S E D I N G  
I N D I C T M E N T

Cr. No. 13-137 (S-1) (DLI)  
(T. 18, U.S.C., §§ 2251(a),  
2251(e), 2252(a)(4)(B),  
2252(b)(2), 2253 and 3551  
et seq.; T. 21, U.S.C., §  
853(p))

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THE GRAND JURY CHARGES:

COUNT ONE  
(Sexual Exploitation of a Child)

1. On or about January 28, 2011, within the Eastern District of New York, the defendant EVIDAL IFRAIMOV did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe, an individual whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: the video depicted in computer file "My movie.wmv," which visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer, to wit: a Western Digital external hard drive, model number WD2500BEVT and serial number WXG1A6015129.

(Title 18, United States Code, Sections 2251(a),  
2251(e) and 3551 et seq.)

FILED  
CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.  
APR 11 2013 ★  
BAKLYN OFFICE

COUNT TWO  
(Sexual Exploitation of a Child)

2. On or about December 6, 2011, within the Eastern District of New York, the defendant EVIDAL IFRAIMOV did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: the image depicted in digital camera file "DSCF0044.JPG," which visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer, to wit: a Fujifilm FinePix 2800 zoom digital camera, serial number 22A06123 and Smartmedia media card, model number K9S1208V0M-SSB0 and serial number 7MH704GC.

(Title 18, United States Code, Sections 2251(a), 2251(e) and 3551 et seq.)

COUNT THREE  
(Sexual Exploitation of a Child)

3. On or about December 6, 2011, within the Eastern District of New York, the defendant EVIDAL IFRAIMOV did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: the video depicted in digital camera file "DSCF0050.AVI," which visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and

foreign commerce by any means including by computer, to wit: a Fujifilm FinePix 2800 zoom digital camera, serial number 22A06123 and Smartmedia media card, model number K9S1208V0M-SSB0 and serial number 7MH704GC.

(Title 18, United States Code, Sections 2251(a), 2251(e) and 3551 et seq.)

COUNT FOUR  
(Possession of Child Pornography)

4. On or about June 7, 2012, within the Eastern District of New York, the defendant EVIDAL IFRAIMOV did knowingly and intentionally possess matter containing one or more visual depictions, to wit: images in computer files contained on a silver/black, Dell OptiPlex 360 desktop computer, serial number CQ1BCK1, which visual depictions had been mailed, and shipped and transported using a means and facility of interstate and foreign commerce, and which were produced using materials which had been mailed, and so shipped and transported, by any means including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Sections 2252(a)(4)(B), 2252(b)(2) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

5. The United States hereby gives notice to the defendant that upon his conviction of any of Counts One through Four, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2253, of (a) any visual

depiction described in Section 2251, 2251A, 2252, 2252A, 2252B or 2260 of Title 18, United States Code, and any book, magazine, periodical, film, videotape, and other matter produced, transported, mailed, shipped and received in violation of such offenses of conviction; (b) any property, real and personal, constituting or traceable to gross profits or other proceeds obtained from such offenses of conviction; and (c) any property, real and personal, used or intended to be used to commit or to promote the commission of such offenses of conviction, or any property traceable to such property, including, but not limited to: (a) a Western Digital external hard drive, model number WD2500BEVT and serial number WXG1A6015129; (b) one Fujifilm FinePix 2800 zoom digital camera, serial number 22A06123; (c) a Smartmedia media card, model number K9S1208V0M-SSB0 and serial number 7MH704GC; and (d) a silver/black, Dell OptiPlex 360 desktop computer with serial number CQ1BCK1.

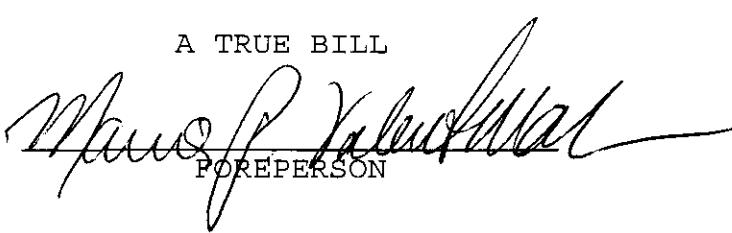
6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 2253; Title 21, United States Code, Section 853(p))

A TRUE BILL

  
Mark P. Yuley  
POREPERSON

  
LORETTA E. LYNCH  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

No.

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UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

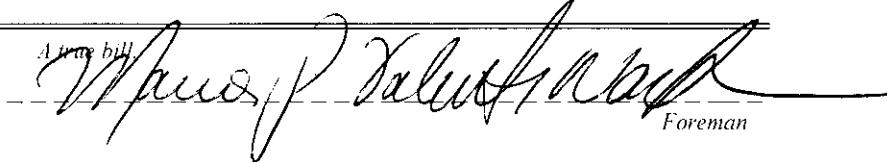
*Evidal Ifraimov,*

Defendant.

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INDICTMENT

(T. 18, U.S.C., §§ 2251(a), 2251(e), 2252(a)(4)(B), 2252(b)(2), 2253 and 3551 *et seq.*; T. 21, U.S.C., § 853 (p).)

*A true bill*  
  
\_\_\_\_\_  
Foreman

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Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20

\_\_\_\_\_  
Clerk

Bail, \$ \_\_\_\_\_

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L. Adriana Lopez, Special Assistant United States Attorney, (718) 254-6410